



Your business
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 30, 2017

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2017 ETC Annual Report of Bluffton Telephone Company
Study Area Code 240512**

Dear Ms. Dortch:

On behalf of Bluffton Telephone Company ("Company"), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is being filed this date via the FCC's Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form****REDACTED FOR PUBLIC INSPECTION**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Cissy Zareva
<035>	Contact Telephone Number: Number of the person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	cissy.zareva@htc.hargray.com
Form Type		54.313 and 54.422

(300) Unfulfilled Service Request Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

(500) Compliance With Service Quality Standards and Consumer Protection Rules		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
240512SC510 .pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations Data Collection Form	REDACTED FOR PUBLIC INSPECTION	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	240512SC610.pdf

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
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<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 240512SC1010.pdf

Name of Attached Document

<1020> Broadband comparability certification Not Applicable

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
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<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
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<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- | | |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
| <1223> Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |

(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2011>	3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>	
<2022>	Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>	
<2023>	The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>	
<2024A>	Round 2 Recipient of Incremental Support?	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>	<div style="border: 1px solid black; width: 200px; height: 60px; margin: 0 auto;"></div>
<2024B>	Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.	Name of Attached Document Listing Required Information	<div style="border: 1px solid black; width: 200px; height: 60px; margin: 0 auto;"></div>
<2025A>	Round 2 Recipient of Incremental Support?	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>	
<2025B>	Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).	Name of Attached Document Listing Required Information	<div style="border: 1px solid black; width: 200px; height: 60px; margin: 0 auto;"></div>
<2015>	2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)		<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>

(2005) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

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<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
Yes - Attach Certification			
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		240512SC3010B.pdf
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input checked="" type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input checked="" type="checkbox"/>
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	240512SC3026.pdf

(3005) Rate Of Return Carrier Additional Documentation (Continued)		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	240512
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<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com

Financial Data Summary

- (3027) Revenue
- (3028) Operating Expenses
- (3029) Net Income
- (3030) Telephone Plant In Service(TPIS)
- (3031) Total Assets
- (3032) Total Debt
- (3033) Total Equity
- (3034) Dividends



(4005) Rural Broadband Experiment Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	240512
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<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
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<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
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Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
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4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	
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Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	240512
<015> Study Area Name	BLUFFTON TEL. CO.
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<030> Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035> Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: BLUFFTON TEL. CO.	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/30/2017
Printed name of Authorized Officer: David Armistead	
Title or position of Authorized Officer: GC & Sec	
Telephone number of Authorized Officer: 8436861275 ext.	
Study Area Code of Reporting Carrier: 240512	Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	240512
<015> Study Area Name	BLUFFTON TEL. CO.
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<030> Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035> Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

Bluffton Telephone Company, Inc.’s demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

Bluffton Telephone Company, Inc. (“Bluffton”) hereby certifies that it is in compliance with applicable service quality standards and consumer protection rules. Bluffton is subject to consumer protection obligations under both federal and South Carolina state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Public Service Commission of South Carolina which disclose rates, and terms and conditions of service to customers (Section 103-612.2.1 of the South Carolina Code of Regulations); (2) adherence to state consumer protection requirements governing telephone providers which govern Standards and Quality of Service (Sections 103-661, 103-662, and 103-663 of the South Carolina Code of Regulations); Customer Relations,

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

including billing, deposits, discontinuance and termination of service (Sections 103-620 through 103-633 of the South Carolina Code of Regulations); Engineering and Safety Standards (Sections 103-640 through 103-646 and 103-670 through 103-672 of the South Carolina Code of Regulations); Inspections and Tests (Sections 103-650 through 103-653 of the South Carolina Code of Regulations); Records and Reports (Sections 103-610 through 103-619 of the South Carolina Code of Regulations) and Customer Complaints (Section 103-628 of the South Carolina Code of Regulations); (3) truth-in-billing requirements (Section 103-622.1 of the South Carolina Code of Regulations); and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

Bluffton is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in 47 CFR § 8.3.

Bluffton Telephone Company's demonstration of ability to function in emergency situations for voice and broadband services:

Bluffton Telephone Company, Inc. ("Bluffton") hereby certifies that it is able to function in emergency situations as set forth in 47 C.F.R. § 54.202(a)(2)¹ and Section 103-646 of the South Carolina Code of Regulations. Bluffton's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2) and Section 103-646 of the South Carolina Code of Regulations. Bluffton can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow Bluffton to manage traffic spikes throughout its network, as emergency situations require. In addition, Bluffton has redundancy for connectivity purposes *via* additional routes and electronic equipment for voice and broadband services.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. Bluffton has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as Bluffton has access to fuel.

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

REDACTED FOR PUBLIC INSPECTION

**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com

<701> Residential Local Service Charge Effective Date

1/1/2017

<702> Single State-wide Residential Local Service Charge

<703>

[illegible]

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com

[illegible]

REDACTED FOR PUBLIC INSPECTION

(800) Operating Companies Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com
<810>	Reporting Carrier	Bluffton Telephone Company, Inc.
<811>	Holding Company	Hargray Communications Group, Inc.
<812>	Operating Company	Bluffton Telephone Company, Inc.

[illegible]

Statement Regarding Certification of Voice Rate Comparability
Line 1010

Bluffton Telephone Company, Inc. (BTC) is a rural, rate of return regulated incumbent local exchange carrier operating in the state of South Carolina, and is an eligible telecommunications carrier (ETC) designated by the South Carolina Public Service Commission.

BTC hereby certifies that the pricing of its voice services is no more than two standard deviations above the national average urban rate for voice service, \$49.51, as specified in the February 14, 2017, Public Notice issued by the Wireline Competition Bureau of the Federal Communications Commission.

BTC Local Service Rates including the SC state USF fee and mandatory EAS are as follows:

Limited Local Service \$18.33

Basic Local Service \$25.18

Average Local Svc Rate \$21.76

South Carolina Lifeline

Under the Lifeline program, qualifying telephone and/or qualifying broadband customers who participate in Medicaid (Healthy Connections), Food Stamps (SNAP), Supplemental Security Income (SSI), Federal Public Housing Assistance (FPHA), or Veterans Pension or Survivors Pension are entitled to receive a monthly discount up to \$12.75 applicable towards telephone service OR \$9.25 applicable towards qualifying broadband service. If you are a telephone or broadband customer who does not participate in any of these programs, but your total household income is at or below 135% of Federal Poverty Guidelines, you may be eligible to receive the Lifeline benefit. Hargray is eligible to provide the Lifeline benefit to qualifying residential telephone and broadband customers ONLY in Hilton Head, Hardeeville, and Bluffton.

*Lifeline is a government-supported service. Applicants will be required to provide documentation necessary to verify eligibility. Applicants who willfully make false statements in order to obtain Lifeline benefits can be punished by fine or barred from the program. Only ONE Lifeline benefit per household. A household is not permitted to receive Lifeline benefits from multiple providers.

GENERAL CUSTOMER SERVICES TARIFF

BLUFFTON TELEPHONE COMPANY, INC.
BLUFFTON, S.C.
REVISED: APRIL 2, 2012

SECTION 3
1st Revised Page 12
Cancels Original Page 12

S3. BASIC LOCAL EXCHANGE SERVICE

S3.10 Lifeline Program

(C)

S3.10.1 General

- A. The Lifeline program is designed to increase the availability of telecommunications services to low income subscribers by providing a credit to monthly recurring local service for qualifying residential subscribers.
- B. Lifeline is provided under the federal universal service support mechanism as a federal benefit.
- C. Lifeline is mandated by the Federal Communications Commission.

S3.10.2 Regulations and Rates

Regulations and Rates shall be concurrent with those mandated by the FCC and The Public Service Commission of South Carolina.

(C)

S3.10.3 Eligibility and Certification

Eligibility and Certification shall be concurrent with the requirements of the FCC and The Public Service Commission of South Carolina.

GENERAL CUSTOMER SERVICES TARIFF

BLUFFTON TELEPHONE COMPANY, INC.
BLUFFTON, S.C.
EFFECTIVE: June 1, 2016

SECTION 3
15th Revised Page 1
Cancels 14th Revised Page 1

S3. LOCAL EXCHANGE SERVICE

S3.1 General

3.1.1 Local exchange service rates in this tariff are as identified with the Bluffton Telephone Co., Inc. of Bluffton, South Carolina.

3.1.2 Extended Area Service (EAS)

a. Implemented pursuant to South Carolina Public Service Commission Order No. 2007-346

b. Expands local calling to include the following exchange areas:

Beaufort, SC
Hardeeville, SC
Hilton Head Island, SC
Laurel Bay, SC
Pooler, GA
Lowcountry, SC

Bluffton, SC
Ridgeland, SC
Savannah, GA
St. Helena, SC
Tybee Island, GA

(T)

c. Monthly recurring charge per line of service:

\$2.30/Residential

\$4.60/Business

3.1.3 Local Exchange Service Offerings

a. **Limited Local Service** allows voice calls to the areas identified in 3.1.2(b) preceding.

Voice calls made outside of 3.1.2(b) preceding, are subject to additional charges.

b. **Basic Local Service** allows calls to any location within the United States and its Territories including but not limited to Alaska, Hawaii, U.S. Virgin Islands, Puerto Rico, Northern Antilles and Guam.

Applies to residential lines only and not offered in conjunction with business lines

Intended for normal voice usage equal to, or less than 3,600 usage minutes per month

In the event monthly usage exceeds 3,600 minutes per month, excess usage charges apply at \$0.01 per minute for each minute in excess of 3,600 minutes

3.1.4 Rates for service and equipment not specifically shown in this section are presented in other sections of this tariff.

GENERAL CUSTOMER SERVICES TARIFF

BLUFFTON TELEPHONE COMPANY, INC.
BLUFFTON, S.C.
EFFECTIVE: June 1, 2016

SECTION 3
5th Revised Page 1.1
Cancels 4th Revised Page 1.1

S3. LOCAL EXCHANGE SERVICE

S3.2 Monthly Exchange Rates

3.2.1 Monthly exchange rates are authorized by the Public Service Commission of South Carolina as shown below.

3.2.2 Limited Local Service as identified in 3.1.3(a) preceding

Monthly Rate

a.	Residential		
	Each Single	\$ 15.70	(I)
	EAS	<u>\$ 2.30</u>	
	Base Charge	\$ 18.00	
b.	Business		
	Each Single Line, Key Trunk, PBX Trunk or Paystation	\$ 30.28	(I)
	EAS	<u>\$ 4.60</u>	
	Base Charge	\$ 34.88	

3.2.3 Basic Local Service as defined in Section 3.1.3(b) preceding

a.	Residential Single Line	\$ 22.42	(I)
	EAS	<u>\$ 2.30</u>	
	Base Charge	\$ 24.72	



2017 South Carolina Lifeline Assistance Application

Check the box next to **ONE** of the statements below:

☐ I wish to apply the lifeline discount of \$12.75 to my home **telephone service** with Hargray

OR

☐ I wish to apply the lifeline discount of \$9.25 to my qualifying **internet** service with Hargray

Step 1: Applicant Information *(fill in each block entirely & check appropriate boxes)*

Your Hargray Phone #	First Name	MI	Last Name
Address Where Service Is Located (No PO Boxes)			City & State
Is this your permanent address? (circle one) <div style="text-align: center;">YES NO</div>			Zip Code
Billing Address, City, State & Zip Code (If different from Service Address) (PO Boxes Allowed)			
Last 4 Digits of Social Security Number			Date of Birth

Step 2: Determine whether you qualify for lifeline based on participation in the eligible programs of section A, or because you meet the income eligibility requirements of section B.

Section A

PROGRAM ELIGIBILITY: check the following program(s) in which you, or a member of your household, currently participate. **Please attach a copy of eligibility documentation.** If the program participant is not you, but a member of your household, please print the name of the program participant here:

Federal Public Housing Assistance (FPHA) or Section 8	Supplemental Security Income (SSI)
Medicaid	Veterans Pension or Survivors Pension
Supplemental Nutrition Assistance Program (SNAP) formerly known as food stamps	

Section B

INCOME ELIGIBILITY GUIDELINES: If you do not participate in any of the programs above, you may still be eligible for Lifeline Assistance if your annual household income is at or below the amounts shown below (135% of FPG) depending on the size of your household. PLACE A CHECK next to the total number of people in your household. Please indicate the number of household members if more than 8.

Persons in family/household	2017 Poverty Guidelines – 135%
1 _____	\$16,281
2 _____	\$21,924
3 _____	\$27,567
4 _____	\$33,210
5 _____	\$38,853
6 _____	\$44,496
7 _____	\$50,139
8 _____	\$55,782

For families/households with more than 8 persons, add \$5,643 for each additional person:

PLEASE COMPLETE NEXT PAGE. BOTH PAGES OF THIS APPLICATION ARE REQUIRED IN ORDER TO PROCESS YOUR APPLICATION. PLEASE INCLUDE YOUR ELIGIBILITY DOCUMENTATION WITH YOUR APPLICATION.

2017 South Carolina Lifeline Assistance Application

IT IS IMPORTANT FOR YOU TO KNOW:

- Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program
- Only one Lifeline service is available per household
- A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses
- A household is not permitted to receive Lifeline benefits from multiple providers
- Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's (or "FCC") rules and will result in the subscriber's de-enrollment from the program
- Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person

WE CANNOT PROCESS YOUR APPLICATION WITHOUT YOUR CERTIFICATION:

You MUST initial each line next to each certification statement AND sign and date below.

I certify, under penalty of perjury, that:

- _____ I meet the income-based or program-based eligibility criteria for receiving Lifeline, shown above.
- _____ I will notify the carrier within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, (a) if I no longer meet the income-based or program-based criteria for receiving Lifeline support; (b) I am receiving more than one Lifeline benefit, (c) or another member of my household is receiving a Lifeline benefit.
- _____ If I move to a new address, I will provide that new address to Hargray within 30 days.
- _____ My household will receive only one Lifeline service and, to the best of my knowledge, my household is not already receiving a Lifeline service.
- _____ The information contained in this certification form is true and correct to the best of my knowledge.
- _____ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- _____ I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify my continued eligibility will result in de-enrollment and the termination of my Lifeline benefits.

I hereby authorize Hargray to release any of my information contained in this Lifeline Application required for the administration of the Lifeline program to the FCC or its designee, including the Universal Service Administrative Company, and to any state and federal agency, as required by law.

Applicant's Signature: _____ Date: _____

Statement Regarding Milestone Certification
Line 3010A

Bluffton Telephone Company, Inc. (BTC) hereby certifies that it has taken reasonable steps to provide upon reasonable request broadband service that meets the Federal Communications Commission's public interest obligations in § 54.308(a), and that requests for such service are met within a reasonable amount of time.

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3026

ATTACHMENT REDACTED IN ENTIRETY